

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

***D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
Spoliation-notice@mailbox.org***

July 17, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

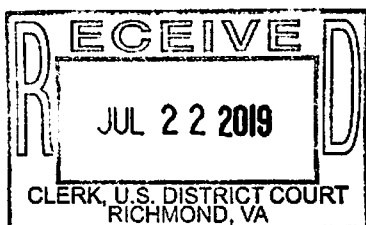
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL
District Judge M. Hannah Lauck

**SUBJECT: PART THREE: ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN VIA ECF DOC. NO. 139**

REF: (a) MANUEL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834

Good Morning:

1. This letter addresses the false misrepresentations that you continue to present to this honorable Court based on insufficient tainted evidence that has been created with the cooperation of your CrowdSource The Truth (CSTT) side kick, see ref: (a), known as "DEFANGO".



**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

2. Your attention is kindly directed to ECF Doc. No. 139, para. 7, shown below.

7 7. On or about June 18, 2019, Manuel Chavez III contacted Defendant and began sharing
8 testimony and email evidence of his relationship and communications with Steven S. Biss
9 and his wife Tanya Cornwell. In these emails, both Cornwell and Biss are persistent in
0 their encouragement of Chavez to sue Goodman based on claims similar to this instant
1 legal action. It is Defendant's belief this violates Virginia State Law Title 18.2. Chapter
2 10. Crimes Against the Administration of Justice » Article 4. Barratry » § 18.2-451.
3

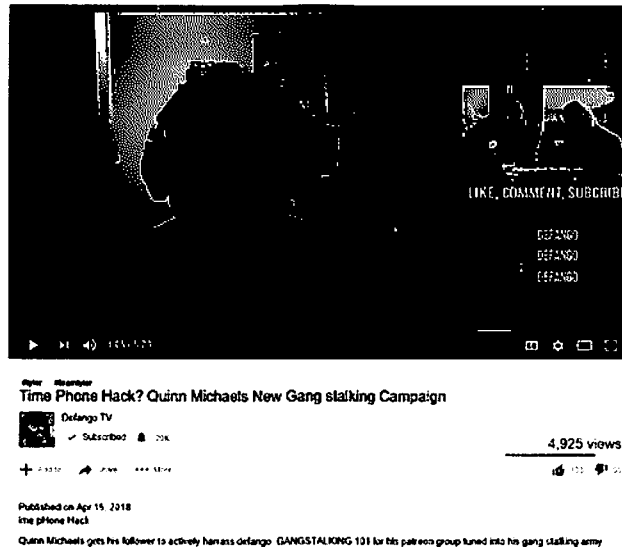
3. As you have reported, "Manuel Chavez, III", ref: (a), (known as DEFANGO, or DEFANGO TV, or MERLIN DEFANGO or LARP WARS on the YouTube social media platform) provided you with "...testimony and email evidence...".

4. Ref: (a) (DEFANGO) has made a least a dozen videos (distributed in a widely pervasive manner) directed at you and "CrowdSource The Truth" (CSTT). None of these videos are supportive of your efforts.

5. Your attention is directed to the ref: (a) video production entitled, "*Time Phone Hack? Quinn Michaels New Gag stalking Campaign*", April 15, 2018 (see below).

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



Published on Apr 15, 2018
ime pPhone Hack

Quinn Michaels gets his follower to actively harrass defango. GANGSTALKING 101 for his patreon group tuned into his gang stalking army.

Please report this harrassment to Law Enforcement.

Internet URL: <https://www.youtube.com/watch?v=vxgG7EfLUb8>

6. Below is a relevant transcript of the video commentary (cited above):

- 00:02 REF: (a). Alert everyone. It looks like Jason Goodman and Quinn Michaels and C.S. THE TRUTH are back on their gang-stalking tirade. It looks like after a lot of negative information has been placed they have decided they wanted to start a new gang stalking campaign.
- 05:12 REF: (a). I shouldn't have to deal with this type of gang stalking that comes from CrowdSource The Truth. It has been on-going now for over 10 (ten) months with Quinn Michaels and Jason Goodman.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

7. Your attention is directed to the video content (published in a widely pervasive manner) by ref: (a) (DEFANGO), entitled, "*Time Phone hack? Quinn Michaels starts a Crowdstalking campaign. Legal Evidence*", April 15, 2018 (see below).



Streamed live on Apr 15, 2018
Multistreaming with <https://restream.io/>

Internet URL: <https://www.youtube.com/watch?v=IR8iKaZ1fU&t=255s>

8. Relevant commentary is presented below in a transcript from the above video.

06:30 REF: (a). And Casey Whalen and f_cking Quinn Michaels and f_cking Jason Goodman are always doing this sh_t. Always doing this sh_t. It's like, I mean, I don't even get a f_cking break.

08:20 REF: (a). This is what we would call a targeted crowd stalking harassment campaign.

13:40 REF: (a). Oh, right. That's right. That's the gang stalking crew that Quinn Michaels has been putting together with this guy ... Jason Goodman.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

9. Your attention is directed to the video production (widely distributed) by ref: (a) (DEFANGO), entitled, "*Jason Goodman Legal Nightmare*", April 1, 2019.



Streamed live on Apr 1, 2019

Looks like Jason Goodman of crowdsource the truth has some big issues moving forward on that not so fake legal case.

Internet URL: <https://www.youtube.com/watch?v=RtYo4F4vrJ8&t=149s>

10. Relevant commentary is provided in the transcript below (see above cited video).

01:42 REF: (a). I think the one thing that DEFANGO is gonna have to deal with .. is that ... he's probably gonna have to testify. I mean Defango is gonna have to testify. And then Defango is going to be sitting in open court. And they are gonna be like ... 'Mr. Defango is it true that Jason Goodman said that you spoofed the Seth Rich files'. And then Defango is gonna be on the stand and say .. 'Yes, he said that'. And then. Then Jason Goodman, their gonna be like, "Is it true that Jason Goodman attacked you and said that you hacked his personal computer with no evidence'. And I'm gonna be like, 'Yes, that is true'.

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

11. Your attention is kindly directed to para, 21 of your ECF Doc. N, 139 (see below).

21. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

12. At the outset, you have provided no copies of any electronic mail messages in the EXHIBITS of DCF Doc. No. 139, e.g. FROM: and/or TO: "THOMAS SHOENBERGER". If such e-mail messages do exist, it is suggested you present them to the Court in lieu of a fraud on the court allegation. In the alternative, your statement "...Thomas Shoenberger ... who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Goodman..." appears to be fraudulent on it's face. It seems apparent that you posses NO such evidence and that your statement concerning Mr. Shoenberger is misleading, in gross error, or a blatant false misrepresentation intended to deceive this Court.

13. As you admit in the above cite, you have little or no knowledge of Thomas Shoenberger. The following information might illuminate your understanding of the false narrative you are publishing that conflates the undersigned with "the organization of the monetized conspiracy".

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

14. In June 2019 ref: (a) published for wide distribution a dozen YouTube social media videos discussing Thomas Shoenberger and the acrimonious disputes between the two (DEFANGO vs. SHOENBERGER) over the corporation SHADOWBOX STRATEGIES. Apparently, ref: (a), Mr. Shoenberger and someone known as "Trevor Fitzgibbon" created this corporation (this entity is rumored to have been incorporated in August 2017).

15. As shown below, ref: (a) has filed a Temporary Restraining Order (TRO) against Mr. Shoenberger in the courts of Carson City, Nevada (Case No. 19 PO 00276 1C).

Busted lestat telling lies again about Steven biss and Thomas Schoenberger

1 Case No. 19 PO 00276 1C
2 Dept. No. 1
3
4
5
6 MANUEL CHAVEZ III. Applicant,
7
8 vs.
9 THOMAS ANDREW SCHOENBERGER Adverse Party.
10
11

IN THE JUSTICE COURT OF CARSON TOWNSHIP
IN AND FOR CARSON CITY, STATE OF NEVADA

FILED
2019 MAY 31 PM 4:04
JUSTICE OF THE PEACE
BY [Signature] CLERK

TEMPORARY PROTECTION ORDER

☒ STALKING/HARASSMENT NRS.200.591
☐ AGGRAVATED STALKING NRS 200:591
HARASSMENT NRS 200:591
KUAL ASSAULT NRS 200.378

Issued: MAY 31, 2019
ation Date: JUNE 27, 2019

0:50 / 1:53

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



**Busted lestat telling lies again about Steven biss
and Thomas Schoenberger**

LARP WARS

1 week ago • 354 views

Lestat is still made about not being about to extort more money. So today
he's claiming that phone call where I showed Steve biss ...

Published on Jun 24, 2019

Lestat is still made about not being about to extort more money. So today he's claiming that
phone call where I showed Steve biss number and talked to him is now apparently Thomas.
What an idiot

Internet URL: <https://www.youtube.com/watch?v=svJhLWwExWw>

16. There have been dramatic videos related to the dispute between Mr. Schoenberger and
ref: (a), who have accused each other of lying, spreading “disinformation” and quibbling about
the formation of SHADOWBOX STRATEGIES. Both parties have very recently provided
testimony in the following case:

**U.S. District Court
for the District of Columbia
RICH v. BUTOWSKY et al
CASE #: 1:18-cv-00681-RJL
Judge Richard J. Leon**

SUMMARY

17. The record seems to indicate that you have been harassing ref: (a) (DEFANGO) in a
multi-year social media smear campaign. It also appears that ref: (a) (DEFANGO) is capable of
“hacking” into your personal computer. Now, suddenly, ref: (a) provides you with “evidence”
that implicates yet another party (an enemy of ref: (a)) in the “the organization of the monetized
conspiracy”. And you have accepted this evidence from someone that “hacked” your computer.

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

18. Ref: (a) is consumed with an acrimonious social media war of words against Mr. Shoenberger, which creates significant bias and prejudicial suspicion of ref: (a)'s claims. Ref: (a) has obtained judgements for restraining orders against this person as part of this on-line social media feud. Now it appears (without any evidence) that ref: (a) (DEFANGO) has implicated Mr. Shoenberger as someone that was participating in (as you cite) "the organization of the monetized conspiracy" ("...[t]he emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad ...").

19. You have provided NO such e-mail messages as evidence. Again, this creates the impression that your assertion about Mr. Shoenberger is false, in error, and / or a misrepresentation that is NOT supported by any evidence – except the word of an individual that is suing Mr. Shoenberger (see ref: (a) restraining orders) who purportedly "hacked" your computer.

20. Your attention is directed at the below cite from *U.S. v. Larry Recio* , 17-4005, U.S. Court of Appeals, Fourth Circuit.

A proponent of evidence must "produce evidence sufficient to support a finding that the item is what the proponent claims it is." Fed. R. Evid. 901(a). However, "the burden to authenticate under Rule 901 is not high." *United States v. Hassan*, 742 F.3d 104, 133 (4th Cir. 2014) (internal quotation marks and citation omitted). The district court must merely conclude that "the jury *could* reasonably find that the evidence is authentic," not that the jury necessarily *would* so find. *See id.* (internal quotation marks and citation omitted) (emphasis added).

Internet URL: <http://www.ca4.uscourts.gov/opinions/174005.P.pdf>

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

21. You have not met the burden for the presentation of this so-called evidence. Your allegations that somehow the undersigned worked with, worked for, conspired with or had conspiratorial planning with ref: (a), the Plaintiff, or the co-defendant or any of their associates is false, devoid of truth, unfounded, meritless and unsupported by any evidence. It appears you have attempted to commit a fraud upon the Court.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 17
day of July 2019.



**D. G. SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

Copy provided:

Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525

7.17.19

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROBERT DAVID STEELE, -against- JASON GOODMAN, Defendant.	Plaintiff,
---	-------------------

17-CV-00601-MHL

CERTIFICATE OF SERVICE

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 17 day of July, 2019.



**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

7.17.19